

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION-DETROIT

IN THE MATTER OF:

RAMON I. ALVAREZ  
KIMBERLY D. ALVAREZ,  
Debtors.

1817 Willard Dr.  
Canton, MI 48187  
XXX-XX-5912  
XXX-XX-9183

Case No. 14-49330-MBM  
Honorable MARCI B. MCIVOR  
Chapter 13

**OBJECTIONS TO CONFIRMATION OF PROPOSED CHAPTER 13 PLAN  
ON BEHALF OF FORD MOTOR CREDIT COMPANY LLC**

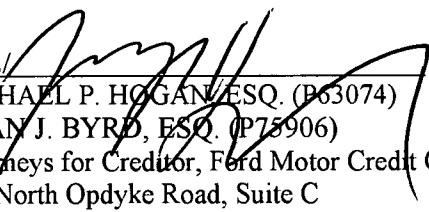
Creditor Ford Motor Credit Company LLC (“Objector”) by and through counsel, KILPATRICK & ASSOCIATES, P.C., states:

1. The Debtors (“Debtor” as used herein shall include both Debtors in a joint case) filed a voluntary Chapter 13 petition on May 30, 2014.
2. On the Petition Date the Debtor was indebted to Objector in the amount of \$28,631.09 (plus interest, fees and costs) and in possession of the following: 2014 Ford F150 (VIN: 1FTFX1EF2EFB08861) (Acct. No.: 1905) (the “Vehicle”).
3. The Vehicle listed in Paragraph 2 was purchased on a Retail Installment Sale Contract (the “Contract”).
4. The Proposed Plan cannot be confirmed for the following reasons:
  - (a) The Proposed Plan understates the contractual monthly payment. The correct payment is \$426.06.
  - (b) The Objector is not adequately protected pursuant to 11 U.S.C. §1326 as:
    - (i) The Debtor has failed to demonstrate the Vehicle is insured pursuant to 11 U.S.C. §1326(a) (4).

**WHEREFORE**, Ford Motor Credit Company LLC requests the Court to deny confirmation of the Proposed Plan, and to grant such other relief as may be appropriate and just.

Respectfully submitted,

**KILPATRICK & ASSOCIATES, P.C.**

By:/s/  
  
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Dated: June 10, 2014